

Exhibit A

**THE COURT OF COMMON PLEAS, CIVIL DIVISION
CUYAHOGA COUNTY, OHIO**

Clerk of Courts | The Justice Center | 1200 Ontario Street 1st Floor, Cleveland, Ohio 44113

TERRY L. FOSTER
Plaintiff

CASE NO. CV25117754

JUDGE WILLIAM F. B. VODREY

v.

GRAY LOCAL MEDIA, INC.
Defendant

SUMMONS

SUMC CM

Notice ID: 57011143



From: TERRY L. FOSTER P1
1001 OLIVESBURG RD.
MANSFIELD OH 44905-0000

Atty.: TERRY L. FOSTER
1001 OLIVESBURG RD.
MANSFIELD, OH 44905-0000

To: GRAY LOCAL MEDIA INC. D1
4370 PEACHTREE RD NE SUITE#400
ATLANTA GA 30319-0000

NOTICE TO THE DEFENDANT:

The Plaintiff has filed a lawsuit against you in this Court. You are named as a defendant. A copy of the **Complaint** is attached.

If you wish to respond to the Complaint, you must deliver a written **Answer** to the Plaintiff's attorney (or the Plaintiff if not represented by an attorney) at the above address *within 28 days* after receiving this Summons (not counting the day you received it). A letter or a phone call will not protect you. Civil Rule 5 explains the ways that you may deliver the **Answer** (<http://www.supremecourt.ohio.gov/LegalResources/Rules/civil/CivilProcedure.pdf>)

You must also file a copy of your **Answer** with this Court within 3 days *after* you serve it on the Plaintiff. You can file your **Answer** with the Clerk of Courts by one of the following methods: 1) In-person or by mail at the above address or 2) electronically through the online e-Filing system. For more information on using the e-Filing system, visit <http://coc.cuyahogacounty.gov/en-US/efiling.aspx>.

If you fail to serve *and* file your **Answer**, you will lose valuable rights. The Court will decide the case in favor of the Plaintiff and grant the relief requested in the **Complaint** by entering a default judgment against you.

You may wish to hire an attorney to represent you. Because this is a civil lawsuit, the Court cannot appoint an attorney for you. If you need help finding a lawyer, contact a local bar association and request assistance.



Nailah K. Byrd
Clerk of Court of Common Pleas
216-443-7950

Date Sent: 05/19/2025

By _____


Deputy



Cuyahoga County Clerk of Courts Nailah K. Byrd

Multilingual Notice:

You have been named as a defendant in this Court. You must file an answer within 28 days; if you fail to answer, the Court may enter judgment against you for the relief stated in the Complaint. Seek assistance from both an interpreter and an attorney. Your inability to understand, write, or speak English will not be a defense to possible judgment against you.

1. Spanish (US)

***Aviso multilingüe:

Este Tribunal lo ha declarado como acusado. Debe presentar una respuesta en un plazo de 28 días. Si no contesta en dicho plazo, el Tribunal podrá dictar sentencia en su contra por el amparo que se detalla en la demanda. Solicite la ayuda de un intérprete y de un abogado. Su incapacidad para comprender, escribir o hablar inglés no se considerará como defensa ante una posible sentencia en su contra.

2. Somali

***Ogeysiis luqadda badan ah:

Waxaa lagu magacaabay sida eedeysane gudaha Maxkamadan. Waa in aad ku soo gudbisaa jawaab 28 maalmood gudahood; haddii aad ku guuldareysto jawaabta, Maxkamada laga yaabo in ay gasho xukun adiga kaa soo horjeedo ee ka nasashada lagu sheegay Cabashada. Raadi caawinta ka timid labadaba turjubaanka iyo qareenka. Karti la'aantaada aad ku fahmo, ku qoro, ama ku hadasho Af Ingiriisiga ma noqon doonto difaacida xukunkaaga suuralka ah ee adiga kugu lidka ah.

3. Russian

***Уведомление на разных языках:

Вы были названы в качестве ответчика в данном суде. Вы должны предоставить ответ в течение 28 дней; если Ваш ответ не будет получен, суд может вынести решение против Вас и удовлетворить содержащиеся в жалобе требования. Воспользуйтесь услугами переводчика и адвоката. Тот факт, что Вы не понимаете английскую речь и не можете читать и писать по-английски, не является препятствием для возможного вынесения судебного решения против Вас.

4. Arabic

***ملاحظة متعددة اللغات:

لقد تم اعتبارك مدعى عليه في هذه المحكمة. يجب أن تقدم ردا خلال 28 يوما؛ وإذا لم تقم بالرد، فقد تصدر المحكمة حكما ضدك بالتعويض المنصوص عليه في هذه الشكوى القضائية. اطلب المساعدة من مترجم فوري ومحام. فلن تعد عدم قدرتك على فهم اللغة الإنجليزية أو كتابتها أو تحديثها دفاعا لك أمام الحكم المحتمل ضدك.

5. Chinese (Simplified)

***多語版本通知：

您在本法庭已被列为被告。您必须于 28

日内递交答辩状；如果没有递交答辩状，法庭会针对诉状中声明的补救措施对您作出不利判决。请向口译人员和律师寻求帮助。您无法理解、书写或说英语的情况不能作为对您可能作出不利判决的辩护理由。

Justice Center, 1st Floor • 1200 Ontario Street • Cleveland, Ohio 44113-1664 • 216.443.7950

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IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO
CIVIL DIVISION

TERRY L. FOSTER #800636
1001 OLIVESBURG ROAD
MANSFIELD, OH 44905
Plaintiff(s)

V.

GRAY LOCAL MEDIA, INC.
4370 PEACHTREE ROAD N.E. STE. 400
ATLANTA, GA 30319
Defendant(s) et al.

Judge: WILLIAM F. B. VODREY
CV 25 117754


CIVIL COMPLAINT

JURY TRIAL DEMANDED

Now comes the Plaintiff(s), Terry L. Foster, by and through his Civil Complaint, and Respectfully Moves the Honorable Court pursuant to the Ohio Civ.R. 7, for an Order for damages against the Defendant(s), Gray Local Media, Inc., due to their, Flagrant Negligent; Defamation of Character; and Libel Slander; from a false news broadcasting, through their media platforms.

A Memorandum in Support of this Civil Complaint is attached hereto.

Respectfully Submitted,


Terry L. Foster #800636
1001 Olivesburg Road
Mansfield, OH 44905

MEMORANDUM

1. On or about the 22th day of November, 2021, News station 19News, which is broadcast on television station WOIO & WUAB-TV stations owned by Gray Local Media, Inc., hereafter “Defendant(s)” received false information from the Cleveland Police Department, hereafter “CPD” that the Plaintiff had shot a unarmed woman from his car window.
2. This information was a totally false accusation for which 19News never fact check the information before they broadcast Plaintiff name, face, and any or all pertinent private information on their news reporting platforms; which is television, internet, and any other outlets for which the Defendant(s) owns.
3. The Defamation and Slander of Plaintiff character was harmed to the highest extent you can reach; due to the thousands to millions of viewers that the Defendant(s) news platforms can broadcast out too.
4. Plaintiff life has been in danger due to such false carelessness national to international news broadcast. Plaintiff family members from his, but not limited to his (i.e.) Mother; Sisters; Daughters; Son; Grandchildren; Nieces; even his extended family members which are Cousins; Stepchildren; and beyond has suffer death threats harm and acts of violent physical attacks from such media news broadcast negligence; off of an invalid false accusation generated by the CPD to the news station.
5. The CPD, new that the information against the Plaintiff was false when they further investigated, which showed that the Plaintiff did not participate in no crime. Thereafter, the CPD switched their false narrative to one of Plaintiff’s alleged girlfriends just to keep the another false narrative going; just to wrongfully convict the Plaintiff, and one of his alleged girlfriend as the offenders, well after they gave 19News false information about the Plaintiff.
6. Plaintiff, spent over 3 years in jail, for which came from 15 ½ months in the Cuyahoga County Jail, and 24 ½ plus months in the Ohio Department of Correction & Rehabilitation. Before such false case was vacated off Plaintiff, by the 8th District Court of Appeals, due to Insufficient Evidence, fabricated falsely, from a Reckless Investigation from the CPD.
7. The press is not free to publish with impunity everything and anything it desires to publish. Although it may deter or regulate what is said or published, the press may not circulate knowing or reckless falsehoods damaging to private reputation without subjecting itself to liability for damages, including punitive damages, or even criminal prosecution. A newspaper, news-station or a journalist may also be punished for contempt of court, in appropriate circumstances.


8. Freedom of Speech, Free Press: The First Amendment does not guarantee the press a constitutional right of special access to information not available to the public generally. Newsmen, nor News Stations, have no Constitutional right of access to the scenes of crime or disaster when the general public is excluded, and they may be prohibited from attending or publishing information about trials if such restrictions are necessary to assure a defendant a fair trial before an impartial tribunal, from libel and slander.
9. The publisher of a newspaper, or an owner of a news-station, has no special immunity from the application of general laws. News outlets has no special privilege to invade the rights and liberties of others. Branzburg v. Hayes, 408 U.S. 665
10. Plaintiff, damages are irreversible from the false reporting of Defendant(s) broadcast through their media news platforms.
11. Plaintiff, has endured pain and suffering; emotional & physical distress; mental anguish; and discrimination harm, from the flagrant violation news media broadcast; due to the Defendant's news broadcasting staff at WOIO & WUAB-TV, located and broadcasting out of Cleveland, Ohio.
12. The only remedy of recourse the Plaintiff has is this civil complaint that will allow the Plaintiff, to stop the everyday threats and pain, for which he endures throughout the days, weeks, and years, Plaintiff, has suffered; and from future suffering. Due to the Defendant(s).
13. Plaintiff, also ask this honorable court for an injunction to have Defendant's news staff to refrain from doing any further harm to the Plaintiff, and publish a retraction correction of the false statement to the false news story ran on their media platforms.
14. Plaintiff, also request Defendant to pay attorney fees and court cost.
15. Plaintiff, will entertain all mediation and settlement negotiations, initiated by the Plaintiff(s), Defendant(s), or the Court; and/or set it for trial.

(WHEREFORE) Plaintiff, demands compensatory and punitive prayer damages against the Defendant(s) in the amount for the sum of \$415,000,000; and the ownership of WOIO & WUAB-TV.

CERTIFICATE OF SERVICE

The undersigned Plaintiff, hereby submits that true and accurate copy of the foregoing Civil Complaint was forward to the Clerk of Court Office, to be serve by and through the U.S. Postal Mail Service, to be serve directly upon the Defendant(s), and/or their counsel at, Gray Local Media, Inc. 4370 Peachtree Road N.E. Ste. 400, Atlanta, GA 30319.

Respectfully, Submitted

A handwritten signature in black ink, appearing to read "Terry L. Foster", written in a cursive style.

Terry L. Foster, Plaintiff